To the Federal Communications Commission June 22, 2004

Regarding Notice of Inquiry for ET Docket 03-104

I wish to express the following concerns regarding the deployment of "Broadband over Power Line" (BPL) technology and ask that you consider them in your deliberations.

BPL has the potential to seriously interfere with, and even disrupt, licensed radio services, while is itself prone to disruption from properly operating, licensed radio transmitters.

Existing FCC Part 15 rules which limit the amount of RF current that can be injected into power lines were formulated before the use of high-speed BPL devices was contemplated.
Their use under those rules may, therefore, be totally inappropriate.

Studies conducted by the American Radio Relay League indicate that BPL would create "a significant increase in noise levels". This is likely to adversely affect government, commercial, and amateur radio users, as well as short-wave broadcast listeners. It may also affect cable TV and DSL service in close proximity to BPL equipment on utility poles.

BPL creates high noise levels across broad portions of the high frequency (HF) radio spectrum. The power-transmission lines it uses act as broadcast antennas, creating the potential for interference far beyond the local BPL service area.

No procedures have been outlined to resolve BPL interference to mobile radio users. Their moving, temporary locations make it difficult to identify or remove interference sources.

Obtaining the cooperation of BPL providers to curtail interference to others would be problematic. At least one utility has already said that it independently concluded it doesn't have to take any more measures to reduce interference, regardless of what licensed users may report.

The broadband access that BPL may offer can be better provided by other technologies such as cable, DSL lines, and Wi-Max broadcast. The latter is a form of wireless access that isn't fraught with the interference issues of BPL. Such other technologies also appear more reliable and less subject to service disruptions. For these reasons, the expenditure of utility company funds in BPL schemes would poorly serve their investors.

In summary, BPL deployment should be canceled or significantly curtailed because:

-- It has the potential to cause serious interference to licensed radio users.
-- It is Itself subject to disruption from licensed radio users.
-- Interference problems would be difficult to resolve.
-- Other suitable technologies offer the desired broadband service without the disadvantages of BPL.

Respectfully Submitted,
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